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April 1, 2004

VIA E-MAIL AND U.S. MAIL

Michael A. Roberts, Esq. Graydon, Head & Ritchey LLP 1900 Fifth Third Center 511 Walnut Street Cincinnati, OH 45202-3157

Re: Eric L. Jeffries v. Centre Life Insurance Company, et al.

Case No. C-1-02-351

Dear Mike:

In accordance with the Court's March 30, 2004 Notice relating to Final Pretrial, Defendant intends to call the following witnesses:

- Plaintiff: Eric Jeffries
- Plaintiff's treating physicians: Dr. Calabrese, Dr. Crafton, Dr. Dunn, Dr. Fritz, Dr. Hawkins, Dr. Hyde, Dr. Luggen, Dr. McClellan, Dr. Nunlist-Young, Dr. Reed, Dr. Waisbren;
- Corporate Representative: Eileen Sweeney;
- Individuals involved in evaluating Plaintiff's disability claim: Jeffrey Champagne, Dr. Clionsky, Andrew Cohen, Dr. Garb, John Graff, Lucinda Palmer;
- Expert witnesses: Dr. Bullard, Dr. Clionsky, Dr. Frey, Dr. Hartings;

Michael A. Roberts, Esq. April 1, 2004 Page 2

> Defendant reserves the right to call any witness identified by Plaintiff and rebuttal witnesses including those necessary to address information technology, surveillance, and corporate issues.

> > Very truly yours,

Peter M. Burrell

PMB/smk